

Bristol City Council Local Plan (2026-2041)
STRATEGIC TRANSPORT MATTERS STATEMENT OF COMMON GROUND

between

National Highways
Bristol City Council

04 July 2025

1 Introduction and background

- 1.1 This Statement of Common Ground (SoCG) covering strategic transport matters has been prepared at the submission of the Bristol Local Plan Publication Version (the 'Local Plan') (2025-2040) and following the Regulation 19. The SoCG has been signed by Bristol City Council and National Highways, referred to hereafter as 'the parties'.
- 1.2 National Highways is responsible for the safe and efficient operation of the Strategic Road Network (SRN). In the Local Plan area, SRN matters relate to existing and future capacity and safety issues on the motorways, which comprises the M32 Junctions 1 to 3, M4 Junction 19, M5 Junction 18 and M49 Junction 1.

2 Strategic matters that are agreed

- 2.1 National Highways and Bristol City Council (BCC) have met quarterly since February 2022 as part of their ongoing cooperation to discuss and review wider planning matters – including the Local Plan - to ensure that understanding of likely traffic impacts on the SRN is kept up to date to assist with the assessment of development proposals.
- 2.2 The parties agree that early consideration of transport matters fed into the development of the Local Plan development strategy.
- 2.3 The National Planning Policy Framework (NPPF) requires transport issues to be considered from the earliest stages of plan-making. The parties note that national planning policy states that the planning system should actively manage patterns of growth to realise opportunities from existing and proposed transport infrastructure, to promote walking, cycling and public transport and to address impacts on transport networks and the environmental impacts of traffic and transport infrastructure.
- 2.4 The NPPF (para. 104-105) states that "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes." The parties agree with the Local Plan approach to locate development in central parts of the city and close to existing amenities to reduce the need for longer distance car journeys, and agree that it will limit the need to travel, offering a genuine choice of transport modes .
- 2.5 National Highways supports the Local Plan allocation policies to focus development at locations which are or can be made sustainable.

- 2.6 The parties agree that the West of England Transport Model WERTM (which covers Bath and North East Somerset, Bristol, South Gloucestershire and North Somerset) is the correct tool to model the impact of Local Plan Traffic on the SRN.
- 2.7 National Highways (in its Reg.19 representations to the Local Plan and throughout our discussions with BCC regarding the emerging Local Plan) highlighted current performance matters relating to the SRN within and just outside the authority boundary, and the need for robust transport evidence to support the Local Plan. This requirement is in line with DfT Circular 01/2022 paragraphs 47 to 54 and NPPF paragraph 110.
- 2.8 National Highways has expressed significant concerns regarding the methodology and assumptions used by BCC in assessing the transport impacts of its proposed Local Plan, particularly in relation to the Strategic Road Network (SRN). In its Hearing Statement, National Highways noted that it was not consulted on the scope of the transport evidence base or the methodology employed by BCC.
- 2.9 The core of National Highways' concern lies in how BCC applied and interpreted data from the National Trip End Model (NTEM). BCC assumed that NTEM version 8.0 already incorporated most of the Local Plan's proposed development—specifically, 25,763 dwellings and 24,658 jobs—and that the associated traffic impacts had already been mitigated. As a result, BCC's Do Minimum (DM) scenario for 2042 included this growth, while the Do Something (DS) scenario only accounted for the remaining 4,448 dwellings and 6,055 jobs. BCC then presented the difference between these two scenarios as the transport impact of the Local Plan.
- 2.10 BCC considers this approach to be reasonable. In its view, there is an assumption embedded within it that a degree of the existing housing and jobs allocated from previous local plans can be mitigated by existing transport plans and projects. As such the traffic growth from these interventions can be considered to have been assessed already or to be in the process of being mitigated by current interventions such as the City Region Sustainable Transport Settlement schemes which will not all be included in the model. Hence there would be no expectation of further mitigation on the SRN and National Highways would be expected to be accounting for this wider growth in their own long term strategic planning.
- 2.11 BCC considers that the fact that these interventions may not all be in the model (and therefore reducing congestion) could lead to some degree of trip suppression for the additional trips then being tested in the do something model. The question is whether this would be material given the low number of expected additional trips, and Bristol City Council considers this would not make a significant difference to the results reported in the modelling. Hence, the approach is considered by Bristol City Council to be proportionate for the issues being considered.
- 2.12 National Highways disagrees with this approach, arguing that NTEM is a forecasting tool and does not account for mitigation. It contended that the full impact of the Local Plan—comprising all 29,106 dwellings and 30,713 jobs—should be assessed in the DS scenario, with the DM scenario reflecting only committed developments. Furthermore, National Highways was not satisfied with the uniform application of growth across the city in BCC's model, which does not reflect the actual geographic distribution of proposed developments in the traffic model; National Highways considers that this approach underestimates the true impact on the road network, particularly the SRN.

- 2.13 BCC considers it took a proportionate approach to the distribution of additional housing and jobs and associated flows which is appropriate for the dense urban network being analysed where increases in flow in one area will lead to traffic diverting to adjacent routes if there is additional congestion. Given the sustainable nature of the proposed development strategy for Bristol, and the pattern of development proposed within the local plan this approach was considered by the council to be reasonable and proportionate.
- 2.14 To address these concerns, National Highways developed a revised DM scenario. This new model, referred to as the New DM, removed the Local Plan-related growth from the original BCC DM scenario. By comparing this New DM with the unchanged BCC DS scenario (i.e. 29,106 dwellings and 30,713 jobs), National Highways was able to isolate and assess the full impact of the Local Plan on traffic flows.
- 2.15 When comparing the New DM to the BCC DS scenario, the analysis showed substantial increases in traffic across Bristol, particularly on key routes such as the M5 and M32. The modelling also highlighted that the M4 Junction 19 slip road onto the M32 operated above capacity in the New DM scenario, causing rerouting of traffic. In contrast, in the BCC DS scenario, this junction operated within capacity, resulting in increased traffic on the M32, especially at Junction 1.
- 2.16 Further analysis focused on SRN junctions. Most junctions experienced low to moderate increases in traffic, with M32 Junction 1 showing the most significant rise due to reduced delays at M4 Junction 19. The only major area of concern identified was the M5 southbound during the AM peak, which saw an increase of 722 trips in the BCC DS scenario compared to the New DM. A detailed investigation revealed that most of these trips originated from longer-distance sources such as the M4 westbound, M49 southbound, and the Avonmouth area, with only about a third coming from within the Greater Bristol urban area.
- 2.17 National Highways maintains that BCC's modelling approach to determine the transport impacts of the Local Plan is unconventional. Its revised modelling provides an improved assessment of how the proposed growth will affect the SRN. Refinement of the modelling work to reflect the impact of low car parking/car free development more accurately within the city centre locations could further reduce the Local Plan impacts on the SRN.
- 2.18 Overall, the new Local Plan is expected to have a moderate impact on the SRN. While the modelling does not suggest critical failures on the SRN, it highlights the sensitivities of the network around Bristol, and the need for careful monitoring particularly where traffic redistribution may lead to increased pressure at junctions, especially at M32 Junction 1 and M5 Junctions 18 and 19. It further identifies the need for robust Highways Development Management policies to ensure development located within the city centre are car free/low car.
- 2.19 BCC concurs and considers that the policies in the local plan are robust in achieving those objectives as they expect development in central Bristol to have a form, scale and density consistent with its central urban location and an approach to parking which reflects the accessible location with opportunities for the use of sustainable and active transport.
- 2.20 Following this modelling analysis, National Highways is also content that the allocation at Frome Gateway will not have an adverse impact on the SRN (this was site allocation was a concern in its Reg.19 representations to the Local Plan).

2.21 National Highways is now satisfied that the traffic impacts anticipated from the new Local Plan allocations have been satisfactorily evidenced. While the modelling does not suggest critical failures on the SRN, it highlights the sensitivities of the network around Bristol, and the need for careful monitoring particularly where traffic redistribution may lead to increased pressure at junctions, especially at M32 Junction 1 and M5 Junctions 18 and 19. It further identifies the need for robust Highways Development Management policies to ensure development located within the city centre are car free/low car developments.

3 Commitments for future work and collaboration

- 3.1 The parties will engage proactively and positively on ongoing strategic transport matters relating to the Local Plan.
- 3.2 The parties will work together to implement the transport policies contained within the Local Plan when adopted.
- 3.3 The parties will continue to ensure they engage from the outset of new development proposals, and throughout the pre-application process, to ensure that development proposals likely to impact on the SRN present a robust transport evidence base.

4 Signatories

Simon Shapland Spatial Planning Manager South West
Signed on behalf of National Highways

S. Shapland

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Colin Chapman Deputy Head of Planning Services (Planning Policy)
Signed on behalf of Bristol City Council

Colin Chapman

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Dated
04 July 2025

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